

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Etta Calhoun, Sherry Porter, and  
Cynthia Gray, on behalf of themselves and  
all other persons similarly situated,

Plaintiffs,

v.

Invention Submission Corporation d/b/a  
InventHelp, Technosystems Consolidated  
Corp., Technosystems Service Corp., Western  
Invention Submission Corp., Universal  
Payment Corporation, Intromark  
Incorporated, Robert J. Susa, Thomas Frost,  
P.A., Thomas Frost, John Doe Companies 1-  
10, John Doe Individuals 1-10,

Defendants.

No. 2:18-cv-01022

Magistrate Judge Patricia L. Dodge

This Document Also Relates To:

*Carla Austin, et al. v. Invention Submission  
Corporation, et al.*, No. 2:19-cv-01396

*Geta Miclaus, et al. v. Invention Submission  
Corporation, et al.*, No. 2:20-cv-681

**PLAINTIFFS' MOTION FOR  
FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiffs in the above-captioned cases, individually and on behalf of the Settlement Class, respectfully file this Motion for Final Approval of Class Action Settlement, and set forth the support for this Motion in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement ("Memorandum of Law"), and the Declaration of Kevin Tran

on behalf of Angeion Group, LLC Regarding Implementation of the Notice Plan and Settlement Administration, attached as Exhibit 1 to the Memorandum of Law, with its attached Exhibit A (CAFA Notice); Exhibit B (Email Notice); Exhibit C (Notice and Claim Form); Exhibit D (Exclusion Requests); and Exhibit E (Objections).

The Motion is based on the accompanying Memorandum of Law, the Declaration submitted therewith, the Parties' Settlement Agreement and all attached Exhibits, and all other records, pleadings, and papers on file in this action. Defendants do not oppose this Motion. A proposed Order is submitted for the Court's consideration.

Dated: January 11, 2023

Respectfully submitted,

/s/ Shanon J. Carson

Shanon J. Carson

Peter R. Kahana

BERGER MONTAGUE PC

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-3000

Email: [scarson@bm.net](mailto:scarson@bm.net)

Email: [pkahana@bm.net](mailto:pkahana@bm.net)

*Lead Class Counsel on behalf of Plaintiffs and the Settlement Class*

Julie Pechersky Plitt (*by pro hac vice*)

Marc S. Oxman (*by pro hac vice*)

OXMAN LAW GROUP, PLLC

120 Bloomingdale Road, Suite 100

White Plains, New York 10605

Telephone: (914) 422-3900

Email: [jplitt@oxmanlaw.com](mailto:jplitt@oxmanlaw.com)

Email: [moxman@oxmanlaw.com](mailto:moxman@oxmanlaw.com)

*Class Counsel on behalf of Plaintiffs and the Settlement Class*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that the foregoing pleading was filed electronically with the Clerk of Court using the ECF system, which sent notifications of such filing to all attorneys of record on this the 11<sup>th</sup> day of January, 2023.

/s/ Shanon J. Carson

Shanon J. Carson

BERGER MONTAGUE, P.C.

1818 Market Street, Suite 3600

Philadelphia, PA 19103

Tel: (215) 875-3000

Email: scarson@bm.net